



Daniel Richland <drichland@rflegal.net>

RE: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

1 message

Danielle Light <dlight@hasbanilight.com>
To: Daniel Richland <drichland@rflegal.net>
Cc: Peter Roh <proh@hasbanilight.com>

Tue, Jan 19, 2021 at 5:12 PM

Yes.

Thank you,

Danielle P. Light, Esq.



450 Seventh Ave, Suite 1408

New York, NY 10123

(P) (212) 643-6677

(F) (347) 491-4048

www.hasbanilight.com

Admitted to practice in NY & NJ



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From: Daniel Richland <drichland@rlegal.net>
Sent: Tuesday, January 19, 2021 5:11 PM
To: Danielle Light <dlight@hasbanilight.com>
Cc: Peter Roh <proh@hasbanilight.com>
Subject: Re: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Friday the 22nd or Monday the 25th?

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
[5 Fairlawn Drive, Suite 204](#)
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
drichland@rlegal.net

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[35-37 36th Street, 2nd Floor](#)
Astoria, New York 11106

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On Jan 19, 2021, at 4:54 PM, Danielle Light <dlight@hasbanilight.com> wrote:

Hi Daniel,

My client can do the depo on Friday starting at 10am or Monday at 10am.

Thank you,

Danielle P. Light, Esq.

<001.jpg>

[450 Seventh Ave, Suite 1408](#)

[New York, NY 10123](#)

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From: Daniel Richland <drichland@rflegal.net>
Sent: Tuesday, January 19, 2021 4:13 PM
To: Danielle Light <dlight@hasbanilight.com>
Cc: Peter Roh <proh@hasbanilight.com>
Subject: Re: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Understood and happy to accommodate. At this point, let's shoot for the end of next week - I have a traverse on 1/26. I have availability on the 27th, 28th, and 29th.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
[5 Fairlawn Drive, Suite 204](#)
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
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On Jan 19, 2021, at 4:10 PM, Danielle Light <dlight@hasbanilight.com> wrote:

Ok, I'm asking him when he can be available – sorry for the confusion. I've never actually had a depo of my client last more than an hour or two...

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

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From: Daniel Richland <drichland@rlegal.net>

Sent: Tuesday, January 19, 2021 4:04 PM

To: Danielle Light <dlight@hasbanilight.com>

Cc: Peter Roh <proh@hasbanilight.com>

Subject: Re: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

I have a full day of questions for him - assume a full 7 hours. I've been preparing for this for months. And previously, Peter said he was available on Friday. The order, here, is that Yonel goes first, Viktoriya, second. If you are cancelling Friday, I need to alert the Court reporter and we need to pick new dates immediately.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
5 Fairlawn Drive, Suite 204
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
drichland@rlegal.net

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On Jan 19, 2021, at 3:55 PM, Danielle Light <dlight@hasbanilight.com> wrote:

How much time do you need for Yonel? I'm concerned about shabbat on Friday... He can start at 3pm.

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

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From: Daniel Richland <drichland@rlegal.net>
Sent: Tuesday, January 19, 2021 3:54 PM
To: Danielle Light <dlight@hasbanilight.com>
Cc: Peter Roh <proh@hasbanilight.com>
Subject: Re: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Monday the 25th works for me and for Viktoriya. Just remember, we'll need a Russian translator.

Very truly yours,

Daniel H. Richland, Esq.
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On Jan 19, 2021, at 3:48 PM, Danielle Light <dlight@hasbanilight.com> wrote:

Yes. What day works for her?

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

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(F) (347) 491-4048

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From: Daniel Richland <drichland@rflegal.net>
Sent: Tuesday, January 19, 2021 3:48 PM
To: Danielle Light <dlight@hasbanilight.com>
Cc: Peter Roh <proh@hasbanilight.com>
Subject: Re: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Ok. So let's proceed on the 22nd with Devico. When do you want to depose Victoria? I assume next week.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
[5 Fairlawn Drive, Suite 204](#)
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
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On Jan 19, 2021, at 3:46 PM, Danielle Light <dlight@hasbanilight.com> wrote:

Yes, just Devico. Don't need to waste time with a corporate rep.

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

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From: Daniel Richland <drichland@rlegal.net>
Sent: Tuesday, January 19, 2021 3:46 PM
To: Danielle Light <dlight@hasbanilight.com>
Cc: Peter Roh <proh@hasbanilight.com>
Subject: Re: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

I spoke to Peter on Friday and I have been waiting on you to get back to me. Am I deposing Deviso or someone else on behalf of Windward Bora? At all the prior conferences, Seth and others have indicated that WB would be represented by a corporate officer. Peter told me now that it is just Deviso.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
[5 Fairlawn Drive, Suite 204](#)
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
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On Jan 19, 2021, at 3:43 PM, Danielle Light
<dlight@hasbanilight.com> wrote:

Hi Daniel,

I'm assuming that we aren't going forward tomorrow. Let me know what the plan is for the rest of the week.

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

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From: Daniel Richland <drichland@rflegal.net>
Sent: Wednesday, January 6, 2021 2:29 PM
To: Danielle Light <dlight@hasbanilight.com>
Cc: Peter Roh <proh@hasbanilight.com>
Subject: Re: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

That is not acceptable. You are offering to have a Russian speaking attorney directly pose questions I cannot understand? You have to be kidding. I am happy to contact the Court and explain why that is unacceptable and you are welcome to explain to the Court why Devico needs a French interpreter.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
[5 Fairlawn Drive, Suite 204](#)
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873

drichland@rflegal.net

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On Jan 6, 2021, at 2:25 PM, Danielle Light
<dlight@hasbanilight.com> wrote:

Daniel,

We're going to have an attorney depose your client in Russian. We have a Russian attorney.

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

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From: Danielle Light
Sent: Wednesday, January 6, 2021 10:50 AM
To: Daniel H. Richland <drichland@rflegal.net>; Peter Roh <proh@hasbanilight.com>
Subject: RE: FW: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Daniel,

Yonel is really not comfortable doing a deposition without a translator. Since we are both needing translators, let's just pay for our own and call it even.

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

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From: Daniel H. Richland <drichland@rflegal.net>
Sent: Wednesday, January 6, 2021 10:40 AM
To: Peter Roh <proh@hasbanilight.com>
Cc: Danielle Light <dlight@hasbanilight.com>
Subject: Re: FW: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Mr. Roh, Esq.:

Thank you for your email. Unfortunately, I must object to this request because it flies in the face of the information that I have. Specifically, I have spoken with your client in settlement discussions in the *Barrie* matter, and this matter, where he talked at length, and he has called me and my client on the phone (as Danielle is aware). On none of those occasions did he indicate that he needed a French translator or *have* a French translator. If he would like one, he is welcome to bring one at his own cost and expense.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
5 Fairlawn Drive, Suite 204
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
drichland@rflegal.net

Queens Office:
Richland & Falkowski, PLLC
35-37 36th Street, 2nd Floor
Astoria, New York 11106

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----- Original Message -----

From: "Peter Roh"
<proh@hasbanilight.com>

To: "Daniel H. Richland"
<drichland@rlegal.net>

Cc: "Danielle Light"
<dlight@hasbanilight.com>

Sent: 1/6/2021 10:02:43 AM

Subject: FW: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Yonel Devico is available on the 22nd as the corporate rep. He would need a French translator.

Regards,

Peter Y. Roh, Esq.

<[image003.jpg](#)>

450 Seventh Ave, Suite 1408

New York, NY 10123

(P) (212) 643-6677

(F) (347) 491-4048

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From: Daniel Richland <drichland@rflegal.net>
Sent: Wednesday, January 6, 2021 9:25:42 AM
To: Danielle Light <dlight@hasbanilight.com>
Subject: Re: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Hi Danielle,

19th for your corporate rep, 20th for Victoria, and 22nd for Devico if needed after your corporate rep. (if not Devico).

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
[5 Fairlawn Drive, Suite 204](#)
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
drichland@rflegal.net

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Astoria, New York 11106

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On Jan 6, 2021, at 9:03 AM, Danielle Light <dlight@hasbanilight.com> wrote:

Lmk when you want to do the deposition.

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

[450 Seventh Ave, Suite 1408](#)

[New York, NY 10123](#)

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(F) (347) 491-4048

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<image002.png>

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From: Daniel H. Richland
<drichland@rflegal.net>
Sent: Monday, December 28, 2020
11:50 PM
To: Danielle Light
<dlight@hasbanilight.com>
Subject: Re[2]: Activity in Case 1:19-cv-07275-DLI-CLP Woodward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Hi Danielle,

When can I expect to receive any final amended responses and when can I expect to depose someone at Woodward Bora?

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
[5 Fairlawn Drive, Suite 204](#)
Washingtonville, New York
10992
(O) 212-390-8872 x 402
(F) 212-390-8873
drichland@rflegal.net

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----- Original Message -----

From: "Danielle Light"
<dlight@hasbanilight.com>

To: "Daniel H. Richland"
<drichland@rflegal.net>

Sent: 12/8/2020 12:53:13 PM

Subject: RE: Activity in Case
1:19-cv-07275-DLI-CLP
Windward Bora LLC v.
Stuyvesant Construction Corp.
et al Set Hearings

Hi Daniel,

Following up on the email below.

Thank you,

Danielle P. Light, Esq.

<image001.jpg>

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New York, NY 10123

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From: Danielle Light
Sent: Friday, December 4, 2020 11:31 AM
To: Daniel H. Richland <drichland@rlegal.net>
Subject: FW: Activity in Case 1:19-cv-07275-DLI-CLP Windward Bora LLC v. Stuyvesant Construction Corp. et al Set Hearings

Daniel,

Where are we on this? Do you have what you need?

Thank you,

Danielle P. Light, Esq.

<

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New York, NY 10123

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From: ecf_bounces@nyed.uscourts.gov<ecf_bounces@nyed.uscourts.gov>
ecf_bounces@nyed.uscourts.gov>

Sent: Tuesday, November 10,
2020 2:15 PM

To: nobody@nyed.uscourts.gov

Subject: Activity in Case 1:19-cv-
07275-DLI-CLP Windward Bora
LLC v. Stuyvesant Construction
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U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 11/10/2020 at 2:14 PM EST and filed on 11/10/2020

Case Name: Windward Bora LLC v. Stuyvesant Construction Corp. et al

Case Number: 1:19-cv-07275-DLI-CLP

Filer:

Document Number: No document attached

Docket Text:

ELECTRONIC SCHEDULING ORDER:
The status conference previously scheduled for 11/13/2020 is adjourned to 12/9/2020 @ 3:15 PM. Conference will proceed via AT&T conference call. Please dial 877-336-1839 at 3:15 PM. Enter Access code: 380-1746 and security code: 19-7275. So Ordered by Chief Magistrate Cheryl L. Pollak on 11/10/2020. (Bayer, Sarah)

1:19-cv-07275-DLI-CLP Notice has been electronically mailed to:

Alan H Weinreb
alan@nyfclaw.com

Alyssa L. Kapner
alyssa@nyfclaw.com

Danielle Paula Light

dlight@hasbanilight.com,hlla
wpc@gmail.com

Seth Daniel Weinberg
sweinberg@hasbanilight.com,
hllawpc@gmail.com

Alan Smikun
alansm@nyfclaw.com

Daniel H. Richland
drichland@rlegal.net

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will not be electronically mailed
to:**